

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN  
DISASTER SITE LITIGATION

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JAIME ROJAS AND JOHANNA HERNANDEZ,

Plaintiff(s), Index No.: 07cv4511

-against-

**NOTICE OF ADOPTION**

**1:21-MC-00102-AKH**

00 CHURCH, LLC, 90 CHURCH STREET  
LIMITED PARTNERSHIP, AMBIENT GROUP,  
INC., AMERICAN EXPRESS BANK, LTD,  
AMERICAN EXPRESS COMPANY, AMERICAN  
EXPRESS TRAVEL RELATED SERVICES  
COMPANY, INC., BANKERS TRUST  
COMPANY, BATTERY PARK CITY  
AUTHORITY, BELFOR USA GROUP, INC., BFP  
TOWER C CO. LLC., BFP TOWER C MM LLC.,  
BLACKMON-MOORING-STEAMATIC  
CATASTROPHE, INC. D/B/A BMS CAT, BOSTON  
PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, LP, BROOKFIELD PARTNERS,  
LP, BROOKFIELDPROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS INC., BT PRIVATE CLIENTS  
CORP., CDL NEW YORK LLC, CUNNINGHAM  
DUCT CLEANING CO., INC., DEUTSCHE  
BANK TRUST COMPANY, DEUTSCHE BANK  
TRUST COMPANY AMERICAS, DEUTSCHE  
BANK TRUST CORPORATION, GPS  
ENVIRONMENTAL CONSULTANTS, INC.,  
HILLMAN ENVIRONMENTAL GROUP, LLC.,  
INDOOR AIR PROFESSIONALS, INC., INDOOR  
ENVIRONMENTAL TECHNOLOGY, INC., LAW  
ENGINEERING P.C., LEHMAN BROTHERS  
HOLDINGS INC., LEHMAN BROTHERS, INC.,  
LEHMAN COMMERCIAL PAPER, INC.,  
MCCLIER CORPORATION, MERRILL LYNCH  
& CO, INC., ROYAL AND SUNALLIANCE  
INSURANCE GROUP, PLC, STRUCTURE TONE  
(UK), INC., STRUCTURE TONE GLOBAL  
SERVICES, INC., THE BANK OF NEW YORK  
TRUST COMPANY NA, TISHMAN INTERIORS  
CORPORATION, TRAMMELL CROW

COMPANY, TRAMMELL CROW CORPORATE  
SERVICES, INC., TRC ENGINEERS, INC.,  
TUCKER ANTHONY, INC., VERIZON  
COMMUNICATIONS, INC., VERIZON NEW  
YORK, INC, VERIZON PROPERTIES, INC.,  
WFP RETAIL CO. G.P. CORP., WFP RETAIL  
CO. L.P., WFP TOWER A CO., WFP TOWER A  
CO. G.P. CORP., WFP TOWER A. CO., L.P.,  
AND ZAR REALTY MANAGEMENT CORP., ET  
AL,

Defendant(s).

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C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York  
September 11, 2007

Yours, etc.,

**SAM ROSMARIN, PLLC**



By: \_\_\_\_\_  
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**SERVICE RIDER**

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**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the  
**SERVICE RIDER**



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Cristina A. Villani

Sworn to before me this  
11th day of September 2007



Charlene S. Rogers  
Notary Public  
No. 01RO 4703494  
Qualified in Westchester County  
Commission Expires 11/30/09